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September 16, 2014

By ECF

Honorable Sidney H. Stein
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Andrews v. The City of New York
10 CV 2426 (SHS)(AJP)

Dear Judge Stein:

I am the Assistant Corporation Counsel in the office of Corporation Counsel Zachary W. Carter assigned to defend the above-referenced action.

With class counsel's consent, I write to propose the following schedule for: 1) the parties' joint motion requesting preliminary approval of the proposed settlement of this matter and the scheduling of a fairness hearing; and 2) a briefing schedule for fee applications. The Court may adjust these dates as appropriate, sua sponte, or upon the Court's consideration of the application of either party.

Fairness Hearing Dates

Oct. 3, 2014 – Parties will submit stipulation of settlement, proposed notice to the settlement class and opt-out form, and joint motion requesting preliminary approval of the stipulation of settlement and the scheduling of a Fairness hearing.

November 28, 2014 – Deadline for Mailing Notice to the Class

January 7, 2015 – Deadline for objections and opt-outs

January 22, 2015 – Objections and opt-outs filed with the Court

February 6, 2015 – Fairness hearing

Fee Application Dates

November 3, 2014 – Deadline for fee application

December 18, 2014 – Deadline for opposition to fee application

January 15, 2015 – Deadline for reply to opposition to fee application

At Magistrate Judge Peck's direction, I am enclosing a copy of the transcript of the conclusion of the settlement conference conducted on September 12, 2014.

I thank the Court for its consideration of this proposal.

Respectfully submitted,



Kathleen M. Comfrey
Assistant Corporation Counsel

cc: Magistrate Judge Andrew J. Peck (By ECF)
James L. Linsey (By ECF)